KAZEROUNI LAW GROUP, APC	6069 South Fort Apache Road, Suite 100	Las Vegas, Nevada 89148
--------------------------	--	-------------------------

Michael Kind, Esq.
Nevada Bar No.: 13903
KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148
Phone: (800) 400-6808 x7
FAX: (800) 520-5523
mkind@kazlg.com
Attorneys for Plaintiff Abilio Hernandez

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Abilio Hernandez,	Case No.: 2:19-cv-00291-JCM-VCF
Plaintiff, v.  Allied Collection Services, Inc.,  Defendant.	Second Stipulation for extensions of time to respond to motions [ECF Nos. 18, 20] (Second Request)

Abilio Hernandez ("Plaintiff") and Allied Collection Services, Inc. ("Defendant"), by and through their respective counsel, hereby submit this stipulation for extensions of time for the parties to respond to Plaintiff's motion for summary judgment, ECF No. 18, and Defendant's motion for an order withdrawing admissions under FRCP 36(b), ECF No. 20. Plaintiff's response is currently due on July 11, 2019. ECF No. 24. Defendant's response is currently due on July 17, 2019. ECF No. 24.

The parties are still actively engaged in discussions that may potentially resolve or limit the scope of these pending motions, but need additional time to finalize their discussions. The parties therefore jointly, and in good faith, request an extension of time to respond to the pending motions. This is the second request for

STIPULATION Case No.: 2:19-cv-00291-JCM-VCF

KAZEROUNI LAW GROUP, APC 6069 South Fort Apache Road, Suite 100 Las Vegas. Nevada 89148

## KAZEROUNI LAW GROUP, APC 6069 South Fort Apache Road, Suite 100 Las Vegas. Nevada 89148

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on July 9, 2019, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

## KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u>
Michael Kind
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

STIPULATION Case No.: 2:19-cv-00291-JCM-VCF